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7 Attorney for Defendant, State Farm Mutual  
Fire and Casualty Company parent of  
8 State Farm Mutual Automobile Insurance Company

9 **UNITED STATES DISTRICT COURT**  
10 **DISTRICT OF NEVADA**

11 RIVERPORT INSURANCE COMPANY,  
12 Plaintiff,

13 vs.

14 STATE FARM FIRE AND CASUALTY  
COMPANY, parent of STATE FARM  
15 MUTUAL AUTOMOBILE COMPANY  
16 Defendants.

CASE NO.: 2:18-CV-00330-GMN-NJK

**STIPULATION AND ORDER TO EXTEND  
TIME TO FILE MOTIONS (First Request)  
and TO PRODUCE UNDERWRITING FILE  
(First Request)**

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18 Defendant, State Farm Fire and Casualty Company, erroneously named as “parent of State Farm  
19 Mutual Automobile Insurance Company” (“State Farm”) and Plaintiff, Riverport Insurance Company  
20 (“Riverport”) (hereinafter referred to collectively as the “Parties”), hereby submit the instant Stipulation  
21 and Order To Extend Time to File Motions (First Request) and To Produce Underwriting File (First  
22 Request). This is the Parties’ first stipulation for an extension of time for Riverport to file its  
23 Opposition to State Farm’s Motion for Summary Judgment re: Riverport’s Claims For Equitable  
24 Indemnity, Equitable Subrogation, and Equitable Contribution (ECF No. 22), which is currently due on  
25 December 17, 2018; and the first stipulation for an extension of time for State Farm to produce its  
26 underwriting file, which is currently due by December 20, 2018, pursuant to the Court’s December 6,  
27 2018 Order (ECF No. 29) granting Riverport’s Motion to Compel (ECF No. 21).

28 Although State Farm is diligently attempting to comply with the Court’s Order (ECF No. 29), the

1 holiday schedule and associated pre-arranged absences of personnel preclude State Farm from ensuring  
2 timely production of the materials by December 20, 2018. Accordingly, the Parties hereby stipulate to  
3 extend the deadlines for State Farm's production of the underwriting file, and for Riverport's Opposition  
4 to State Farm's Motion for Summary Judgment re: Riverport's Claims For Equitable Indemnity,  
5 Equitable Subrogation, and Equitable Contribution (ECF No. 22), which may reference materials from  
6 the underwriting file, as follows:

- 7 1) The underwriting file originally to be produced by State Farm by December 20, 2018  
8 pursuant to the Court's Order (ECF No. 29) granting Riverport's Motion to Compel (ECF  
9 No. 21), is to be produced by December 28, 2018;
- 10 2) Riverport's Opposition to State Farm's Motion for Summary Judgment re: Riverport's  
11 Claims For Equitable Indemnity, Equitable Subrogation, and Equitable Contribution  
12 (ECF No. 22), originally due on December 17, 2018, is now due on December 31, 2018;  
13 and
- 14 3) State Farm's Reply is due 14 days after service of Riverport's Opposition unless the  
15 Court orders otherwise pursuant to LR II 7-2.

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1 The Parties submit that the foregoing extensions are requested in good faith, jointly by the  
2 Parties, and not for the purposes of delay.

3 **IT IS SO STIPULATED.**

4 DATED this 12<sup>th</sup> day of December, 2018.

DATED this 12<sup>th</sup> day of December, 2018.

5 HALL JAFFE & CLAYTON, LLP

THE FELDMAN FIRM

6  
7 By: /s/ Kathy A. McCarthy

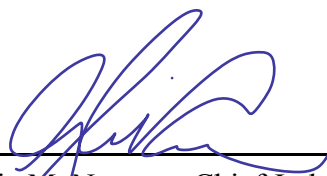
By: /s/ David J. Feldman

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13 **IT IS SO ORDERED.**

14 Dated this 13 day of December, 2018.

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Gloria M. Navarro, Chief Judge  
20 UNITED STATES DISTRICT COURT  
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